

REMARKS

The Specification has been amended. Claims 1 - 11, 14 - 18, and 20 - 21 have been amended to clarify the subject matter which Applicants regard as their invention. No new matter has been introduced with these amendments, all of which are supported in the specification as originally filed. Claim 19 has been cancelled from the application without prejudice. Claims 1 - 18 and 20 - 21 are now in the application.

I. Claim Objections

Paragraph 1 of the Office Action dated June 27, 2006 (hereinafter, "the Office Action") states that Claims 1, 3, 5, 8, 11, and 18 - 21 are objected to because of use of the word "for". Applicants have amended these claims to more clearly specify limitations of their claimed invention, and the Examiner is respectfully requested to withdraw this objection.

II. Rejection under 35 U. S. C. §112, second paragraph

Paragraph 3 of the Office Action states that Claims 4 - 5, 12 - 14, and 19 are rejected under 35 U.S.C. §112, second paragraph, for failing to particularly point out and distinctly claim the subject matter which Applicants regard as their invention.

With regard to the "enabling" language referred to by the Examiner in the Office Action (Page 3, lines 1 - 3), Applicants have reworded their Claims 4 - 5 and 14 to remove this language, and have cancelled Claim 19.

With regard to Claim 4, the Office Action states that there is insufficient antecedent basis for the limitation “the user” in line 4 (now line 5). Applicants respectfully refer the Examiner to line 2 of this claim (as originally filed), where antecedent basis was properly established by the term “a user” (“enabling a user ...”). The term “a user” is now introduced in Claim 1, line 7.

With regard to Claims 12 - 13, the Office Action states that there is insufficient antecedent basis for the limitation “the set” in line 2. Applicants respectfully refer the Examiner to line 2 of Claim 11 (as originally filed; now line 3), where antecedent basis was properly established by the term “a set” (“obtaining a set ...”).

In view of the above, the Examiner is respectfully requested to withdraw this rejection.

III. Rejection under 35 U. S. C. §101

Paragraph 5 of the Office Action states that Claims 1, 5, 8, 11, and 20 - 21 are rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. Applicants have inserted the term “computer-implemented” into the preamble of method Claims 1, 5, 8, and 11. With regard to system Claim 20, Applicants have amended this claim to specify “... a user interface display ...” (Claim 20, line 9). With regard to computer program product Claim 21, Applicants have added the term “storage” into the preamble of this claim. Applicants respectfully submit that these changes resolve the Examiner’s concern, and accordingly, the

Examiner is respectfully requested to withdraw this rejection.

IV. Rejection under 35 U. S. C. §102(e)

Paragraph 7 of the Office Action states that Claims 1 - 2, 4 - 6, 8 - 9, 11 - 16, and 18 - 21 are rejected under 35 U.S.C. §102(e) as being anticipated by U. S. Patent 6,985,899 B2 to Chan et al. (hereinafter, "Chan"). This rejection is respectfully traversed.

Applicants have amended their independent Claims 1, 5, 8, 11, 20, and 21 to more clearly specify limitations of their claimed invention, and Applicants respectfully submit that these independent claims are patentably distinct from Chan, as will now be demonstrated.

As the Federal Circuit stated in *W.L. Gore & Associates v. Garlock, Inc.*, 220 USPQ 303, 313 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984), "Anticipation requires the disclosure in a single prior art reference of *each element* of the claim under consideration." (emphasis added).

With reference to independent Claim 1, the Office Action cites reference number **504** of **Fig. 5** as well as text in col. 6, lines 13 - 15 and lines 16 - 19. Applicants respectfully submit that these citations do not teach each element of Claim 1, and thus, according to the holding in *W.L. Gore & Associates*, Claim 1 is not anticipated by Chan. Reference number **504** states "Initialize Query and Build Select Clause". In the text that introduces **Fig. 5**, Chan states that

Fig. 5 “provides a flow chart for software **102** of the main functional aspects of the embodiment which processes database requests, such as a request generated from screen shot **200** (FIG. 2) ...” (col. 5, line 65 - col. 6, line 1, emphasis added). Referring to the discussion of the screen shot **200**, Chan states (col. 5, lines 26 - 30) that this screen **200** is for a user to enter values (“The query screen **200** has fields into which a user enters values to compose a query ...”, emphasis added). Applicants respectfully submit that this is distinct from their “programmatically identifying ... at least one element ...” (Claim 1, line 3, emphasis added), and that Claim 1 is therefore patentable over Chan.

With reference to independent Claim 5, the Office Action cites reference number **206** of **Fig. 2** as well as text in col. 5, line 35 and col. 6, lines 22 - 23. Applicants respectfully submit that these citations do not teach each element of Claim 5, and thus, according to the holding in *W.L. Gore & Associates*, Claim 5 is not anticipated by Chan. Reference number **206** indicates a user-selected parameter value from a drop-down list, and col. 5, lines 34 - 35 state that the user “selects a price from field **206**”. Lines 22 - 23 of col. 6 refer to “joint predicates”; as further described in col. 8, lines 10 - 14, joint predicates are used “to conduct a search based on multiple tables”, and Applicants fail to see the relevance of this concept to their claim language. Furthermore, Applicants find no statement in Chan that the parameters shown in **Fig. 2** were “user-identified” or “identified by a user” (Claim 5, lines 3 - 4) and no statement that the parameter value at **206** was “programmatically identified” (Claim 5, line 6). Accordingly, Applicants respectfully submit that Claim 5 is patentable over Chan.

With reference to independent Claim 8, the Office Action cites reference number **504** of **Fig. 5** as well as text in col. 6, lines 13 - 15 and lines 16 - 19. Applicants respectfully submit that these citations do not teach each element of Claim 8, and thus, according to the holding in *W.L. Gore & Associates*, Claim 8 is not anticipated by Chan. Reference number **504** states “Initialize Query and Build Select Clause”. In the text that introduces **Fig. 5**, Chan states that **Fig. 5** “provides a flow chart for software **102** of the main functional aspects of the embodiment which processes database requests, such as a request generated from screen shot **200** (FIG. 2) ...” (col. 5, line 65 - col. 6, line 1, emphasis added). Referring to the discussion of the screen shot **200**, Chan states (col. 5, lines 26 - 30) that this screen **200** is for a user to enter values (“The query screen **200** has fields into which a user enters values to compose a query ...”, emphasis added). Applicants respectfully submit that this is distinct from their “programmatically identifying ... at least one candidate query qualifier ...” (Claim 8, lines 3 - 4, emphasis added), and that Claim 8 is therefore patentable over Chan.

With reference to independent Claim 11, the Office Action cites reference number **504** of **Fig. 5** as well as text in col. 6, lines 13 - 15 and lines 16 - 19. Applicants respectfully submit that these citations do not teach each element of Claim 11, and thus, according to the holding in *W.L. Gore & Associates*, Claim 11 is not anticipated by Chan. Reference number **504** states “Initialize Query and Build Select Clause”. In the text that introduces **Fig. 5**, Chan states that **Fig. 5** “provides a flow chart for software **102** of the main functional aspects of the embodiment which processes database requests, such as a request generated from screen shot

200 (FIG. 2) ...” (col. 5, line 65 - col. 6, line 1, emphasis added). Referring to the discussion of the screen shot 200, Chan states (col. 5, lines 26 - 30) that this screen 200 is for a user to enter values (“The query screen 200 has fields into which a user enters values to compose a query ...”, emphasis added). Applicants respectfully submit that this is distinct from their “programmatically identifying ... one or more candidate extensions ...” (Claim 11, lines 4 - 5, emphasis added), and that Claim 11 is therefore patentable over Chan.

Independent Claims 20 and 21 specify limitations which are analogous to those of Claim 11, and are therefore deemed patentable over Chan by virtue of the above-described distinctions between Claim 11 and Chan.

Dependent Claims 2, 4, 6, 9, 12 - 16, and 18 are deemed patentable by virtue of (at least) the patentability of the independent claims from which they depend. The Examiner is therefore respectfully requested to withdraw the §102 rejection of all claims as currently presented.

V. Rejection under 35 U. S. C. §103(a)

Paragraph 9 of the Office Action states that Claims 3, 7, 10, and 17 are rejected under 35 U.S.C. §103(a) as being unpatentable over Chan in view of U. S. Patent 6,055,512 to Dean et al. (hereinafter, “Dean”). This rejection is respectfully traversed.

As demonstrated above, Applicants’ independent Claims 1, 5, 8, and 11 specify

limitations not taught by Chan. Applicants respectfully submit that these limitations are also not taught by Dean, and accordingly, Dean cannot be combined with Chan to render dependent Claims 3, 7, 10, and 17 obvious. Furthermore, these dependent claims are deemed patentable by virtue of (at least) the patentability of the independent claims. The Examiner is therefore respectfully requested to withdraw the §103 rejection.

VI. Conclusion

Applicants respectfully request reconsideration of the pending rejected claims, withdrawal of all presently outstanding objections and rejections, and allowance of all remaining claims at an early date.

Respectfully submitted,

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